

Counsel at end of document

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DEPARTMENT OF FAIR EMPLOYMENT
AND HOUSING, an agency of the State of
California,

Plaintiff,

and,

STEVEN J. CARAUDDO,

Plaintiff-Intervenor,

vs.

LUCENT TECHNOLOGIES, INC., and; DOES
ONE through THIRTY, Inclusive,

Defendants.

) Case No. C 07-3747 PJH

)
)
) **STIPULATION AND [PROPOSED]**
) **ORDER EXTENDING EXPERT**
) **DISCLOSURE AND DISCOVERY**
) **CUTOFF**

STIPULATION

Defendant Lucent Technologies, Inc., plaintiff Department of Fair Employment and Housing
and plaintiff-intervenor Steven Carauddo, collectively referred to herein as "parties" jointly stipulate
as follows:



1 1. This Court's Amended Case Management and Pretrial Order dated October 31, 2007
2 set forth a pretrial schedule including the following dates:

3 Disclosure of Experts (retained and non-retained): August 6, 2008; and,

4 Expert and Non-Expert Discovery Cutoff: September 24, 2008.

5 2. While all parties have done their best to move forward with the discovery needed to
6 prepare this case for trial, the scheduling of depositions has been difficult given the trial calendars of
7 counsel and the need to travel out of state for various corporate depositions. The parties agree that it
8 would be beneficial to have a brief extension of the above deadlines (14 additional days for expert
9 disclosure and nine additional days for discovery cutoff) in order to effectively conduct the
10 disclosure and discovery work that is needed for trial;

11 3. Therefore, the parties request that this court extend the dates for disclosure of experts,
12 and the discovery cutoff, as follows:

13 **Deadline**

Proposed Extended Date

14 Disclosure of Experts (retained and non-retained) Wednesday, August 20, 2008

15 Non-expert and Expert Discovery Cutoff Friday, October 3, 2008

16
17 **SO STIPULATED:**

18 Dated: July 30, 2008

DEPARTMENT OF FAIR EMPLOYMENT
AND HOUSING

TIMOTHY M. MUSCAT
Chief Counsel

SUSAN SAYLOR
Senior Staff Counsel

24 By: /s/ Susan Saylor

25 _____
Susan Saylor
Attorneys for plaintiff, DFEH

1 Dated: July 30, 2008

BOXER & GERSON, LLP

4 By: /s/ Jean K. Hyams

5 Jean K. Hyams
6 Counsel for Steven Carauddo

7 Dated: July 30, 2008

EPSTEIN BECKER & GREEN, P.C.
8 STEVEN R. BLACKBURN
9 LESLIE J. MANN

10 By: /s/ Leslie J. Mann

11 Leslie J. Mann
12 Attorney for defendant
13 LUCENT TECHNOLOGIES INC.

14 **ORDER**

15 The time for completion of disclosure of experts (retained and non-retained), and the
16 discovery cutoff (both expert and non-expert), as ordered by the court in its Amended Case
17 Management and Pretrial Order shall be extended; the new deadlines are:

18 Disclosure of Experts (retained and non-retained): August 20, 2008;

19 Expert and Non-Expert Discovery Cutoff: October 3, 2008.

20
21 Dated: 8/1/08



1 TIMOTHY M. MUSCAT (#148944)

Chief Counsel

2 SUSAN SAYLOR

Senior Staff Counsel

3 DEPARTMENT OF FAIR EMPLOYMENT

AND HOUSING, Oakland Legal Unit

4 1515 Clay Street, Suite 701

Oakland, CA 94612-1460

5 Telephone: (510) 873-6457

Facsimile: (510) 873-0840

6 E-mail: Susan.Saylor@dfeh.ca.gov

7 Attorneys for Plaintiff, DFEH

8 BOXER GERSON, LLP

Jean K. Hyams, State Bar No. 144425

9 300 Frank H. Ogawa Plaza, #500

Oakland, CA 94612-2040

10 Telephone: (510) 835-8870

Facsimile: (510) 835-0415

11 Email: jhyams@boxerlaw.com

12 THE VINICK LAW FIRM

Sharon Vinick State Bar No. 129914

13 350 Sansome Street Suite 350

San Francisco, California 94114

14 Telephone: 415.722.4481

15 Facsimile: 415.276.6338

Attorneys for Real Party in Interest

16 STEVEN J. CARAUDDO

17 Steven R. Blackburn, State Bar No. 154797

Leslie J. Mann, State Bar No. 95467

18 EPSTEIN BECKER & GREEN, P.C.

One California Street, 26th Floor

19 San Francisco, California 94111-5427

20 Telephone: 415.398.3500

Facsimile: 415.398.0955

sblackburn@ebglaw.com

21 lmann@ebglaw.com

Attorneys for Defendant

22 LUCENT TECHNOLOGIES INC.

